

" IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE "

Curro's M. Collins }
PLAINTIFF,

C.A. NO. 05-739-SLR

v.

JURY TRIAL DEMAND

TAMDEN RICK KEARNEY, ET AL.,

Defendants,
MOTION TO EXTEND DEAD-
LINE FOR COMPLETION OF
* DISCOVERY *

RECORDED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2006 AUG 17
3:00 PM
Planned

COMES NOW THE PLAINTIFF CURRO'S COLLINS
IN THE ABOVE MOTION TO EXTEND DEADLINE!
THAT DEFENDANTS COUNSEL HELD A
DEPOSITION DISCOVERY ON AUGUST 17, 2006
8th DAYS BEFORE THE AGREED UPON AUGUST
25, 2006 DEAD LINE THAT BECAUSE PLAINTIFF
HAS NOT BEEN PROVIDED TRANSCRIPTS OF
THE AUG 17, 2006 DEFENDANT'S DISCOVERY HEAR-
ING BEFORE THE AUG 25, 2006 DEAD LINE,
PLAINTIFF HAS NOT BEEN GIVEN THE OPP-
ORTUNITY TO CONTROVERST AND REFUTE THE
POSSIBLE INCORRECT ANSWERS OF THAT
DEPOSITION WHEREAS PLAINTIFF REQUESTS
THIS "HONORABLE" COURT TO EXTEND THE AUG
25, 2006 DEADLINE, 60 DAYS TO ALLOW DEFEN-
DANTS COUNSEL TIME TO SEND TRANSCRIPTS
TO PLAINTIFF WHICH WOULD ALLOW PLA-
INTIFF AN OPPORTUNITY TO CORRECT →

ANY POSSIBLE MISREPRESENTATION
CONTAINED IN THAT TRANSCRIPT, FURTHERMORE
PLAINTIFF REQUESTS THIS COURT TO EXTEND
THE AUG 25, 2006 DEADLINE TO OCT 25, 2006

SINCERELY

* Curtis Bellens

DATE 8-27-06

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CERTIFICATE OF SERVICE'S

I CURTIS M COLLINS
 hereby CERTIFY That ON
 THIS 29-06 DAY
 OF 8, I have handed this
 MOTION TO EXTEND DEAD
 LINE FOR COMPLETION OF'

* DISCOVERY *

TO A DEL' CORR/CENTER
 PRISON GUARD TO PLACE SAID
 MOTION IN D.C.C UNIFIED STATE
 MAIL SYSTEM IN A PRE-PAID
 ENVELOPE TO BE SENT TO THE
 DEI DISTRICT COURT AND

ERIKA V. TROSSESO.
 (ID # 4506)
 DEPUTY ATT' GENERAL
 DEPT. OF JUSTICE
 CARVEL STATE OFFICE BLDG
 820 N. FRENCH STREET
 PH# (302) 577-8400

by:

CLERK
 PETER T. DALLEO
 UNITED STATES DISTRICT
 COURT DELAWARE
 Lock Box 18
 844 N. KING ST
 WILMINGTON, DE 19801

DATE: 8 29- 06

PLAINTIFF Curtis Collins
 Smyrna prisoner